

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VOLVO FINANCIAL SERVICES,)
(f/k/a Volvo Commercial Finance))
a division of VFS US LLC, a Delaware)
limited liability company,)

Plaintiff,

v.

Case No. 07-cv-07075

COBRA LOGISTIC SERVICES, INC.,)
an Illinois corporation,)
Defendant.)

JURISDICTIONAL STATUS REPORT

I. SUBJECT MATTER JURISDICTION

This Court has subject matter jurisdiction based on diversity of citizenship and amount in controversy pursuant to 28 U.S.C. §1332(a). According to the Illinois Secretary of State, since at least April 2001, VFS US LLC has been organized under the laws of Delaware and has its principal office in North Carolina and since February 15, 2006, Plaintiff, Volvo Financial Services, has been a division of VFS US LLC (see attached printout and affidavit). According to the Illinois Secretary of State, since at least January 2002, Defendant is an Illinois corporation, with an agent located in Chicago, IL (see attached printout and affidavit). Furthermore, the amount in controversy, \$88,368.40, can be evidenced by the attached deficiency balance calculations and affidavits signed by Plaintiff.

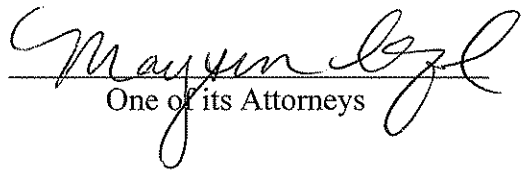
II. VENUE (Plaintiff's Position)

Venue in the instant case is appropriate based on 28 U.S.C. §1391(a) in that a substantial part of the events giving rise to this claim occurred in the Eastern Division of the Northern District of Illinois. Venue is also proper pursuant to

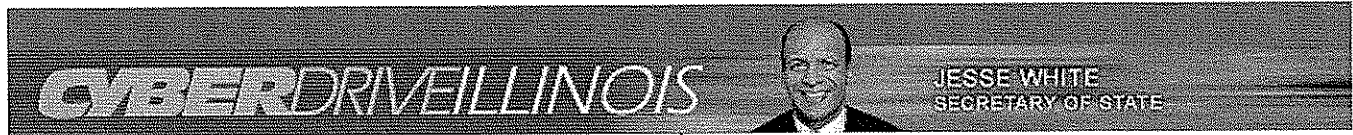
28 U.S.C. §1391(a) because, since January 2002, the defendant's principal place of business was located in Lombard, Illinois which is in DuPage County, Illinois. DuPage County is in the Northern District of Illinois, Eastern Division. Also, the equipment which is the subject matter of this action was shipped to Antioch, Illinois which is in Lake County, Illinois. Lake County is in the Northern District of Illinois, Eastern Division. Please see attached affidavit in support of the aforementioned.

VOLVO FINANCIAL SERVICES,
a division of VFS US LLC, a Delaware
limited liability company,

By:


One of its Attorneys

Patricia E. Rademacher (06205831)
Maysoun B. Iqal (005855)
COSTON & RADEMACHER
105 W. Adams, Suite 1400
Chicago, IL 60603
Telephone: (312) 205-1005



SERVICES PROGRAMS PRESS PUBLICATIONS DEPARTMENTS CONTACT

LLC FILE DETAIL REPORT

| | | | |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------|
| Entity Name | VFS US LLC | File Number | 00540153 |
| Status | GOODSTANDING | On | 03/21/2007 |
| Entity Type | LLC | Type of LLC | Foreign |
| File Date | 04/09/2001 | Jurisdiction | DE |
| Agent Name | CT CORPORATION SYSTEM | Agent Change Date | 04/09/2001 |
| Agent Street Address | 208 S LASALLE ST | Principal Office | 7025 ALBERT PICK RD STE 105 GREENSBORO 27409 |
| Agent City | CHICAGO | Management Type | MGR |
| Agent Zip | 60604 | Dissolution Date | PERPETUAL |
| Annual Report Filing Date | 03/21/2007 | For Year | 2007 |
| Assumed Name | ACTIVE - VOLVO FINANCIAL SERVICES ACTIVE - MACK FINANCIAL SERVICES ACTIVE - NORTH AMERICAN TRANSACTION SERVICES | | |
| Series Name | NOT AUTHORIZED TO ESTABLISH SERIES | | |

[Return to the Search Screen](#)

[Purchase Certificate of Good Standing](#)

(One Certificate per Transaction)

[BACK TO CYBERDRIVEILLINOIS.COM HOME PAGE](#)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VOLVO FINANCIAL SERVICES,
(f/k/a Volvo Commercial Finance)
a division of VFS US LLC, a Delaware
limited liability company,

Plaintiff,

v.

COBRA LOGISTIC SERVICES, INC.,
an Illinois corporation,
Defendant.

Case No. 07-cv-07075

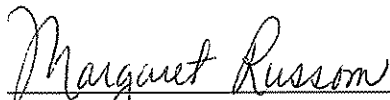
AFFIDAVIT

Now Comes, Margaret Russom, being an adult over 18 years of age, and in her capacity as a Deficiency Litigation Specialist for Volvo Financial Services a division of VFS US LLC, shows the following:

Since at least February 15, 2006, Volvo Financial Services has been a division of VFS US LLC, a limited liability company organized under the laws of Delaware, with its principal place of business in Greensboro, North Carolina.

Further Affiant Sayeth Not.

Sworn under penalty of perjury this 22 day of January, 2008.

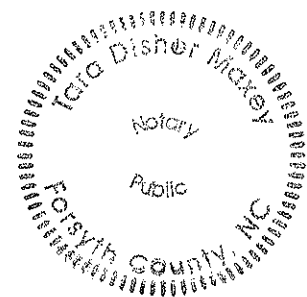


Margaret Russom
Deficiency Litigation Specialist
Volvo Financial Services North America
7025 Albert Pick Road, Ste 105
Greensboro, NC 27409
Phone: 877-865-8623 ext 4546
Fax: 336-931-4546
Email: margaret.russom@vfsc.com

Sworn before me this 22 day of January, 2008.

Notary Public

My Commission Expires: 10-02-2012





SERVICES PROGRAMS PRESS PUBLICATIONS DEPARTMENTS CONTACT

CORPORATION FILE DETAIL REPORT

| | | | |
|-------------------------------|-------------------------------|--------------------------|-----------------------------------------------------------|
| Entity Name | COBRA LOGISTIC SERVICES, INC. | File Number | 61991352 |
| Status | NOT GOOD STANDING | | |
| Entity Type | CORPORATION | Type of Corp | DOMESTIC BCA |
| Incorporation Date (Domestic) | 01/14/2002 | State | ILLINOIS |
| Agent Name | LEON ZELECHOWSKI | Agent Change Date | 01/14/2002 |
| Agent Street Address | 111 W WASHINGTON STE 1437 | President Name & Address | ROBERT W SZCZYPTA 1051 N GARFIELD LOMBARD, IL 60148 |
| Agent City | CHICAGO | Secretary Name & Address | SAME |
| Agent Zip | 60602 | Duration Date | PERPETUAL |
| Annual Report Filing Date | 00/00/0000 | For Year | 2008 |

[Return to the Search Screen](#)

BACK TO CYBERDRIVEILLINOIS.COM HOME PAGE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VOLVO FINANCIAL SERVICES,
(f/k/a Volvo Commercial Finance)
a division of VFS US LLC, a Delaware
limited liability company,

Plaintiff,

v.

COBRA LOGISTIC SERVICES, INC.,
an Illinois corporation,
Defendant.

Case No. 07-cv-07075

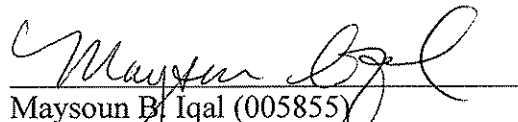
AFFIDAVIT OF JURISDICTION FOR DEFENDANT

Now Comes, Maysoun B. Iqal, being an adult over 18 years of age, and in her capacity as Counsel for Volvo Financial Services, shows the following:


In the preparation of the underlying complaint, information obtained on the Illinois Secretary of State website showed that, since January 14, 2002, Cobra Logistic Services, Inc. has been an Illinois corporation with an agent located in Chicago, IL and therefore, jurisdiction is proper pursuant to 28 U.S.C. §1332(a).

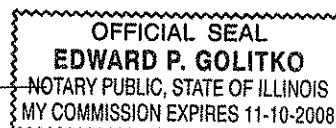
Further Affiant Sayeth Not.

Sworn under penalty of perjury this 23rd day of January, 2008.


Maysoun B. Iqal (005855)
COSTON & RADEMACHER
Attorney for Plaintiff
105 W. Adams, Suite 1400
Chicago, IL 60603
Telephone: (312) 205-1005

Sworn before me this 23rd day of January, 2008.


Notary Public
My Commission Expires: NOVEMBER 10, 2008



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VOLVO FINANCIAL SERVICES,)
(f/k/a Volvo Commercial Finance))
a division of VFS US LLC, a Delaware)
limited liability company,)

Plaintiff,)

v.)

Case No. 07-cv-07075

COBRA LOGISTIC SERVICES, INC.,)
an Illinois corporation,)
Defendant.)

AFFIDAVIT OF VENUE

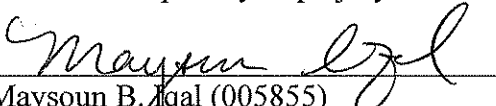
Now Comes, Maysoun B. Iqal, being an adult over 18 years of age, and in her capacity as Counsel for Volvo Financial Services, shows the following:

Venue is proper in the Northern District of Illinois Eastern Division pursuant to 28 U.S.C. §1391(a) because according to the Illinois Secretary of State, since January 2002, the defendant's principal place of business has been located in Lombard, Illinois which is in DuPage County, Illinois. According to the Northern District of Illinois website, DuPage County is in the Northern District of Illinois, Eastern Division.

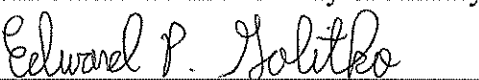
Additionally, upon information and belief, the equipment which is the subject matter of this action was shipped to Antioch, Illinois which is in Lake County, Illinois. According to the Northern District of Illinois website, Lake County is in the Northern District of Illinois, Eastern Division.

Further Affiant Sayeth Not.

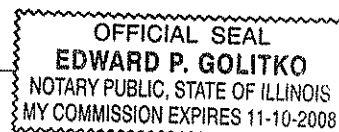
Sworn under penalty of perjury this 23rd day of January, 2008.

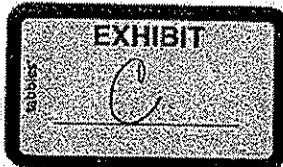

Maysoun B. Iqal (005855)
COSTON & RADEMACHER
Attorney for Plaintiff
105 W. Adams, Suite 1400
Chicago, IL 60603
Telephone: (312) 205-1005

Sworn before me this 23rd day of January, 2008.


Notary Public

My Commission Expires: NOVEMBER 10, 2008





DEFICIENCY BALANCE CALCULATION

CUSTOMER'S NAME: COBRA LOGISTIC SERVICES, INC CONTRACT NUMBER: 500-7553483-001

| | | | | | |
|--------------|-----------|-------|-------------------|---------|-----------|
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF92N326515 | Amt: \$ | 21,171.76 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF22N326548 | Amt: \$ | 21,264.08 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GFX2N326488 | Amt: \$ | 21,417.94 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF52N326530 | Amt: \$ | 21,725.67 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF52N326592 | Amt: \$ | 22,648.75 |
| Buyout Date: | | Vin # | | Amt: | |
| Buyout Date: | | Vin # | | Amt: | |

TOTAL BUYOUT AMT: \$ 108,228.20

Plus:

| | | | |
|-------------------------|----|----------|-------------|
| Repossession Fees | \$ | 1,900.00 | |
| Storage | \$ | - | |
| Commission | \$ | - | |
| Inspection Fees | \$ | 1,500.00 | |
| Cleaning Fee | \$ | 3,000.00 | |
| Repairs/Mechanic's Lien | \$ | - | |
| Transportation | \$ | - | |
| Other (Keys) | \$ | 56.00 | |
| TOTAL FEES | | | \$ 6,456.00 |

Minus

| | | | |
|-----------------------|----|-----------|--------------|
| Gross Sales Proceeds: | \$ | 70,500.00 | |
| Guarantor Payment | \$ | - | |
| Insurance: | \$ | - | |
| TOTAL DEDUCTIONS | | | \$ 70,500.00 |

Customer's Deficiency Balance \$ 44,184.20

Completed by:

Tammie Reynolds

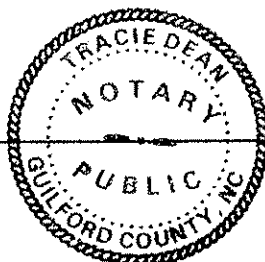
Date:

9/4/2007

State Of North Carolina

County Of Guilford

Sworn & subscribed before me this 24 day of JANUARY, 2008,
 by _____ (I have personal knowledge of the identity of
 the principal)



Notary Public

My Commission Expires: 3-20-2010



DEFICIENCY BALANCE CALCULATION

CUSTOMER'S NAME: COBRA LOGISTIC SERVICES, INC CONTRACT NUMBER: 500-7553483-002

| | | | | | |
|--------------|-----------|-------|-------------------|---------|-----------|
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF12N326511 | Amt: \$ | 21,171.75 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF42N326535 | Amt: \$ | 21,264.10 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF12N326590 | Amt: \$ | 21,417.94 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GF72N326528 | Amt: \$ | 21,725.67 |
| Buyout Date: | 8/30/2007 | Vin # | 4V4NC9GG52N326472 | Amt: \$ | 22,648.75 |
| Buyout Date: | | Vin # | | Amt: | |
| Buyout Date: | | Vin # | | Amt: | |

TOTAL BUYOUT AMT: \$ 108,228.21

Plus:

| | | | |
|-------------------------|----|----------|--------------------|
| Repossession Fees | \$ | 1,900.00 | |
| Storage | \$ | - | |
| Commission | \$ | - | |
| Inspection Fees | \$ | 1,500.00 | |
| Cleaning Fee | \$ | 3,000.00 | |
| Repairs/Mechanic's Lien | \$ | - | |
| Transportation | \$ | - | |
| Other (Keys) | \$ | 56.00 | |
| TOTAL FEES | | | \$ 6,456.00 |

Minus

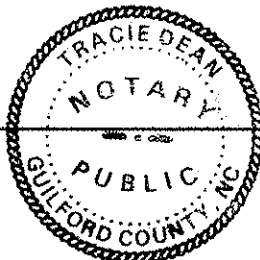
| | | | |
|--------------------------------------|----|-----------|---------------------|
| Gross Sales Proceeds: | \$ | 70,500.00 | |
| Guarantor Payment | \$ | - | |
| Insurance: | \$ | - | |
| TOTAL DEDUCTIONS | | | \$ 70,500.00 |
| Customer's Deficiency Balance | | | \$ 44,184.21 |

Completed by: Tammie Reynolds Date: 9/4/2007

State Of North Carolina

County Of Guilford

Sworn & subscribed before me this 24 day of January, 2008.
 by _____, (I have personal knowledge of the identity of
 the principal)



Notary Public

My Commission Expires: 3-20-2010